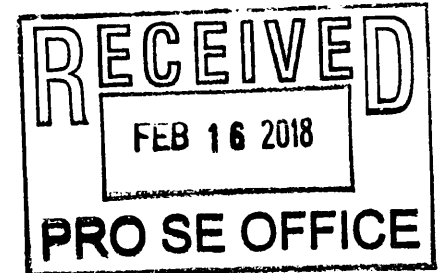


ORIGINAL

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NEW YORK



FLORIN HORICIANU

-against-

NEW YORK CITY,

Jane Doe 1-3

John Doe 1-4

AMENDED COMPLAINT

Case No. 18-CV-0518 (BMC)

Jury Trial Demanded

PRELIMINARY STATEMENTS

You, the person reading these words, regardless of who you are (a clerk, a judge an attorney or anybody else), have to know that your life and/or your children's life and/or your grandchildren's life and many other lives might be saved, one day, based on my scientific work. All I ask you is to give me justice: listen carefully to my words, respect me, do not abuse me, do not hurt me, do whatever you can to help me get justice...

This cry for justice comes as I have endured tremendous injustice (some very powerful people twisted the justice system to hurt me because I said "God will hurt you!" to them) and as I have suffered more injustice every year. If the World will not have the decency to give me justice, I will just take into my grave all the scientific work that I have not made public... I will repeat this statement as much as possible... I wish that everybody's life will be just, that nobody will ever be hurt or abused, that everywhere we will see respect, politeness and smiles... However, I am too old to try to change the entire World, I am just asking the World to avoid me when they feel like they want to hurt, abuse or disrespect somebody... However, I have little faith that I will see justice, as a tree cannot make the monkeys understand that hurting him is harmful to his capacity of making other bananas...

I have been a resident of New York City since 1995. Through all these years I have been the victim of numerous assaults, thefts, and abuses, many of those acts committed by employees of the City of New York.

In the past two years, the rate of criminal acts and abuses done against me, by the employees of the City of New York, has increased to a level that is making my life very difficult. I am filling this complaint as I am seeking immediate protection (see

the injunction that I submitted). The City of New York has ignored the notices I sent (as required by law) and has taken money from me and is keep trying to take money from me, based on the criminal conduct of its employees (what they are doing is not far away from armed robbery). It will be difficult for me to prove all the criminal acts committed by these employees against me (as it is likely they will lie), but it is likely that I will prove at least one criminal act (then, based on a statistical analysis, we will be able to evaluate how many such criminal acts are done every year by the employees of the City of New York. In the end, my conclusion will be that these employees are victims of a system which is not giving them the appropriate psychological and legal assistance needed by any person who is doing this kind of jobs).

As the law is written, I cannot list here, as causes of action, criminal actions committed against me, by employees of the City of New York, in the years before 2016. However, it is my hope that this Court will allow me to tell the jury about all those crimes. Also, other causes of action might have to be addressed in state courts.

THE PARTIES TO THIS COMPLAINT

A. The Plaintiff

Name: Florin Horicianu

Street Address: 228 Park Avenue South

City and County: New York, New York

State and Zip Code: NY 10003

Telephone Number: 917-477-7648

E-mail Address: t@wtw.tw

B. The Defendants are the City of New York and its employees Jane Doe 1-3 and John Doe 1-4

BASIS FOR JURISDICTION AND VENUE

Federal laws, United States Constitution, the Constitution of the State of New York and any other law applicable to this case give jurisdiction to this court.

Venue is proper as many violations listed in this complaint happened in this district.

FIRST CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON AUGUST 20TH, 2017

On August 20th, 2017, police officer John Doe 1 (ID# 952058), acting under the color of state law, violated my civil rights twice: first, by illegally using the lights and sirens to force me to move (when I was legally stopped on 28th Street, close to Newtown Avenue, and when he had no emergency) then, after I followed him, and I witnessed that he had no emergency, then I went to his car, when he was stopped in front of the Police Precinct 114, at 34-16 Astoria Blvd. S., and I told him that he broke the law, then, two seconds after I started my car, he used the lights and sirens to stop me (an obvious retaliatory action which he motivated as I "fail[ed] to signal" the lane change - stupid argument used by that police officer, when there was only one lane on that road... at some point there might have been several lanes there, but, as my video will show, there was almost no paint to clearly mark those lanes).

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to police officer John Doe 1.

Many employees of New York City have had a negative change in personality and behavior because they have not received the appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

It is obvious that this lack of adequate psychological therapy is not something specific to New York City... It is happening in most cities... However, New York City has now the opportunity to show the entire United States and the World how society can function better.

SECOND CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON MAY 15TH, 2017

On May 15th, 2017, I have been illegally stopped and detained on 47 Street by Vanderbilt Avenue, by Jane Doe 1 and several other employees (one with ID# 1573940) of New York City, who were acting under the color of state law. Jane Doe 1, the person who was in charge of those employees believed that she was able to stop and detain me because she was my boss. She made that claim ("I am your boss") several times as I was keep telling her that she was confused... You can clearly see/hear her in the recordings that I have...

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to Jane Doe 1.

Many employees of New York City have had a negative change in personality and behavior because they have not received the appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert

in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

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THIRD CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON AUGUST 4TH, 2017

On August 4th, 2017, police officer Jane Doe 2 (ID# 951552), acting under the color of state law, violated my civil rights, at the Traffic Violation Bureau, located at 30-56 Whitestone Expy, by lying, under oath, about the facts happened on August

19th, 2016, when the police officer Jane Doe 2 violated my civil rights by stopping and detaining me without a good cause. Jane Doe 2 said that I did not stop at a 'stop' sign, when not only that I stopped, I also waited for a pedestrian to cross the street. I am looking forward to understanding why this police officer has lied. Is there such a pressure of fulfilling a quota of traffic tickets that police officers see as a better choice committing criminal acts than being punished for not fulfilling that quota?

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to police officer Jane Doe 2.

Many employees of New York City have had a negative change in personality and behavior because they have not received the appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

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FOURTH CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON MARCH 19TH, 2017

On March 19, 2017, police officers Jane Doe 3 and John Doe 2 (ID# 951990), acting under the color of state law, violated my civil rights by stopping me, on 7th Avenue by 34th Street, without good cause and in an improper and reckless manner and they detained me for a long period of time. Moreover, the officer's behavior was unprofessional, rude, disrespectful, and threatening.

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to police officers Jane Doe 3 and John Doe 2.

Many employees of New York City have had a negative change in personality and behavior because they have not received the appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

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FIFTH CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON AUGUST 27TH, 2017

On August 27th, 2017, at about 8pm, at the 112 Police Precinct, located at 86-40 Austin Street, the police officer who was working at the main desk, located 15 feet as walking straight through the Austin Street entrance, on the first floor of the building, police officer John Doe 3, acting under the color of state law, violated my civil rights by refusing to take a police report or to help me in any way when I told him that I was a victim of a theft and my car's window had been damaged by the thieves. A few months after that, thieves damaged again my car's window and had stolen objects from my car. It was a very similar and peculiar "modus operandi" which would have been a motivation for some good police work. Since then, I have been living in fear that the theft and damage can happen again, as the police has not cared to do anything.

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to police officer John Doe 3.

Many employees of New York City have had a negative change in personality and behavior because they have not received the

appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

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SIXTH CAUSE OF ACTION

VIOLATION OF MY CIVIL RIGHTS ON NOVEMBER 16TH, 2017

On November 16th, 2017, on Kenmare Street by Cleveland Place, police officer John Doe 4 (ID# 957570), acting under the color of state law, violated my civil rights by stopping me without good cause and detained me for a long period of time.

The City of New York is also responsible in this matter as its polices and customs do not provide the proper training and psychological therapy to police officer John Doe 4.

Many employees of New York City have had a negative change in personality and behavior because they have not received the appropriate psychological therapy. I have to emphasize that this change is NORMAL (most people will suffer the same negative change in personality and behavior, when exposed to the difficulties of some type of jobs...). It is what I have seen, with the eyes of an expert (actually, I am more than an expert in psychology... I am not the mere person who has a very high understanding of psychology, I am the person who is writing the science which builds psychology and psychiatry... My science might be taught in medical schools in the future...)...

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most cities... However, New York City has now the opportunity to show the entire United States and the World how society can function better.

RELIEF REQUESTED

The plaintiff is respectfully asking this court to order the defendant to pay compensatory and punitive damages and any other relief this court considers appropriate.

CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: ¹⁶FEB. 14TH, 2018, ~~2018~~.

Signature of Plaintiff Florin Floricianu

Printed Name of Plaintiff FLORIN HORICIANU